

4. The Petition specifically references each Plaintiff's Charge of Discrimination filed with the Equal Employment Opportunity Commission ("EEOC") and the Notice of Right to Sue issued by the EEOC to each Plaintiff. Petition at ¶¶ 9-12.

5. Therefore, the above-described action is a civil action over which the United States District Court has federal question jurisdiction in that Plaintiffs claim damages arising from Defendant's purported violation of a federal anti-discrimination statute (as a federal statute is necessarily implicated by filing an EEOC charge). Therefore, the Court has jurisdiction pursuant to 28 U.S.C. § 1331. Further, the Court has supplemental jurisdiction over the state law claims in Plaintiffs' Petition pursuant to 28 U.S.C. § 1367.

6. Defendant is a Delaware corporation with its principal place of business in Atlanta, Georgia. See Puckett Declaration (attached hereto as Exhibit 3). Plaintiffs allege that they are citizens and residents of Oklahoma. Petition at ¶¶ 1-2.

7. Plaintiffs, in their Petition, state that they seek damages "in excess of \$75,000." Petition at 4.

8. Therefore, the parties are completely diverse, the amount-in-controversy requirement has been met, and the Court has diversity jurisdiction pursuant to 28 U.S.C. § 1332.

9. This Notice of Removal is filed within thirty (30) days of the receipt of the initial pleading; therefore, the Notice of Removal has been timely filed pursuant to 28 U.S.C. § 1446.

10. There are no hearings currently set in state court.
11. All procedures pursuant to 28 U.S.C. § 1446 have been followed.
12. In accordance with the requirements under 28 U.S.C. § 1446(d), Defendant gives notice of this removal by appropriately filing its Notice of Removal in the United States District Court for the Western District of Oklahoma and by serving a copy of this Notice of Removal on Plaintiff's attorney. Defendant has also filed on this date a Notice of Filing Notice of Removal in the District Court of Oklahoma County, Oklahoma.
13. Pursuant to LCvR 81.2 and 28 U.S.C. § 1446(a), attached are clear and legible copies of each of the following:

- (a) Plaintiff's Petition, Summons, and Entry of Appearance, Exhibit 1;
- (b) OSCN Docket Case Summary, Exhibit 2.

WHEREFORE, Defendant respectfully gives notice that this case has been removed from the District Court of Oklahoma County, Oklahoma, to the United States District Court for the Western District of Oklahoma.

Respectfully submitted,

/s/Tony G. Puckett

Tony G. Puckett, OBA No.13336

Joshua A. Cline, OBA No. 30047

McAfee & Taft A Professional Corporation

Tenth Floor, Two Leadership Square

211 N. Robinson

Oklahoma City, Oklahoma 73102

Telephone: (405) 235-9621

Facsimile: (405) 235-0439

tony.puckett@mcafeetaft.com

joshua.cline@mcafeetaft.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of September, 2015, I sent the above and foregoing notice of removal to Plaintiff's counsel at the address listed below by first class mail and electronically transmitted the attached document to the Clerk of the Court using the ECF system for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Rachel L. Bussett
Ashley C. Weyland
Bussett Law Firm, P.C.
3555 N.W. 58th St., Suite 1010
Oklahoma City, OK 73112

ATTORNEYS FOR PLAINTIFF

/s/Tony G. Puckett

Tony G. Puckett